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August 18, 2022

Via Electronic Filing

Honorable Edgardo Ramos, U.S.D.J.
 United States District Court,
 Southern District of New York
 Thurgood Marshall U.S. Courthouse
 40 Foley Square
 New York, NY 10007

Re: *Zambrano, et al. v. Strategic Delivery Solutions, et al.*
Case No.: 15-cv-8410 (ER)

The Court grants Defendants' request to extend both the Discovery Deadline and Notice Deadline by one month, as provided herein. SO ORDERED.



Edgardo Ramos, U.S.D.J
 Dated: August 18, 2022
 New York, New York

Dear Judge Ramos:

This Firm represents Defendants, in connection with the above referenced matter. We write to respectfully request an extension of the deadlines set forth in the Court's recent Opinion and Order (Docket Entry No. 170). The Opinion and Order set an August 31, 2022 deadline for Defendants to provide certain contact information for potential opt-in plaintiffs ("Discovery Deadline") and a September 15, 2022 deadline for the parties to submit a proposed notice to the Court ("Notice Deadline").

We submit this request not for the purposes of delay but due to scheduling issues that conflict with the dates set forth by the Court. To wit, Erin L. Henderson, Esq., the senior associate on the matter, has a long-standing and pre-planned vacation schedule planned for late August and early September. In addition, the undersigned, the partner on the case, will be appearing in late August (and possibly in September) as trial counsel for a trial/evidentiary hearing in the District of New Jersey.

Given these conflicts, Defendants respectfully request a month's extension of the deadlines to September 30, 2022 and October 17, 2022, respectfully. Plaintiffs' Counsel consents to the extension of the Discovery Deadline from August 31, 2022 to September 30, 2022. As to the Notice Deadline, Plaintiffs' Counsel opposes the request, believes that it is unnecessary, and wishes to submit the notice for Court approval as soon as possible. This is the first request for an extension of these deadlines. The Court's time and attention to this matter are very much appreciated.

Respectfully submitted,

JASINSKI, P.C.

David F. Jasinski

DAVID F. JASINSKI

cc: All parties of record via CM/ECF

2 Hance Avenue, 3rd floor
 Tinton Falls, NJ 07724
 ph 973-824-9700 | fax 732-842-1805

308 South New York Road, Suite B
 Galloway, NJ 08205
 ph 609-677-9800 | fax 609-677-9811

670 White Plains Road, Suite 326
 Scarsdale, NY 10583

Please respond to: Tinton Falls